

ORIGINAL

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIAJm
8/15/01UNITED STATES OF AMERICA,
Plaintiff

vs.

\$1,790,021 in U.S. Currency,
Defendant

CIVIL NO. 1:CV-01-1084

(JUDGE RAMBO)

FILED
SCRANTON

AUG 15 2001

PER Jm
DEPUTY CLERKANSWER OF ALEJANDRO MARTINEZ-LOPEZ
TO THE VERIFIED COMPLAINT OF FORFEITURE IN REM

NOW COMES ALEJANDRO MARTINEZ-LOPEZ, Claimant herein, by and through his attorney of record, Chris Flood, and files the following Answer to the Government's Verified Complaint of Forfeiture In Rem:

1. Deny that the \$1,790,021 in U.S. Currency is subject to forfeiture.
2. Deny that the property was involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 or 31 U.S.C. §§ 5316 and 5324(b).
3. Deny paragraphs 2-3, that the money was furnished or intended to be furnished in exchange for controlled substances or used to facilitate violations of 21 U.S.C. §§ 841 and 846, or was person property traceable to such property.
4. Admit.
5. Deny that the tractor trailer was traveling at a high rate of speed
 - (a) - (s) Lack sufficient information to answer, but deny that the \$1,790,021 U.S. Currency was legally seized or that the \$1,790,021 in U.S. Currency is subject to forfeiture.

ORIGINAL

Affirmative Defense

Alejandro Martinez-Lopez is an innocent owner of the subject property.

Respectfully submitted,

FLOOD & FLOOD

Chris Flood / by permission
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Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Answer of Alejandro Martinez-Lopez to the Verified Complaint of Forfeiture In Rem has been served on Theodore B. Smith, III, Assistant U.S. Attorney, by mailing same to United States Courthouse, 235 N. Washington Avenue, Scranton, PA 18501, by certified mail, return receipt requested, on August 14, 2001.

Chris Flood / by permission
Chris Flood